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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN
BROADBENT; GINA ROHBOCK; NOLAN
BARLOW; JASON BLACK; MAY MUSSER;
HOLLY BISTLINE; LAWRENCE BARLOW;
STEVEN DOCKSTADER; MARVIN COOKE;
HELEN BARLOW; VERGEL BARLOW;
CAROLE JESSOP; BRIELL LIBERTAE
DECKER f/k/a, LYNETTE WARNER; AMY
NIELSON; SARAH ALLRED; THOMAS
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION OF
MAY MUSSER**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, May Musser, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.

2. I am a Plaintiff in the above-captioned matter.

3. I make these statements based on my own knowledge and belief.

4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my trial testimony on September 27, 2022.

5. While I was under Warren Jeffs' control, Jeffs knowingly forced me and threatened me with force to obtain my labor and services. Jeffs also knowingly used physical restraint and the threat of physical restraint by confining me in repentance homes and in the Jeffs' compound to obtain my labor and services. Jeffs did this knowingly using his fraudulent scheme, plan, and pattern to cause me to believe that if I did not provide labor and services for him, I would suffer serious harm and physical restraint.

6. Based on my TVPRA and fraud claims against Jeffs, I conservatively estimate that I suffered damages as summarized in this Damages Declaration and as I stated at trial.

7. At trial, I proffered trial Exhibit A in support of the withheld wage damages I incurred as a result of Jeffs' fraud and being labor trafficked. I was not paid for any of this work which I did for Jeffs' benefit. My withheld wage damages total at least \$50,851. *See* trial Exhibit A

8. I fled the FLDS when I was 16 to avoid the fate of a spiritual marriage. Until then I was entitled to the necessities of life from my parents, so I do not believe that there should be any offset against my withheld wages.

9. After leaving the cult, I had to seek extensive mental health care. I estimate that in the past I have had 200 therapy visits at a cost of \$110 per visit at a total cost of \$22,000.

10. Therefore, I claim economic damages in the total amount of at least \$72,851 (\$50,851 + 22,000).

11. Based on the evidence received by the Court in relation to my general or non-economic damages, including the fact that I lost most of my family when I had to flee, I ask for an award of general damages in the amount of \$1,000,000.

12. I estimate that my total economic and non-economic damages are at least \$1,072,851 (\$72,851 + \$1,000,000).

13. Finally, I request an award of punitive damages in an amount equal to my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.



May Musser